

# BOYD | RICHARDS

## MEMO ENDORSED

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March 30, 2020

**Via ECF**

Honorable William H. Pauley, III  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Application granted.

**Re:    *Kreisler v. 40059 Owners Corp., et al.***  
**Case No.:    17 CV 1582**

Dear Judge Pauley:

This office represents defendant 40059 Owners Corp. (the “Coop”) in the above matter.

Pursuant to the Court's Order for a status report in the above-captioned matter, as previously advised, the co-defendant/tenant, II Valentino, converted its Chapter 11 case to a Chapter 7 case in Bankruptcy Court (Case No. 17-10150). A Section 341(a) meeting is currently scheduled for April 23, 2020. Therefore, the disposition of Il Valentino's lease for the subject premises remains unclear. In addition, given the present conditions surrounding COVID-19, restaurants are facing an uncertain future.

Accordingly, the Coop respectfully requests a 60 day stay of the action, with a report to be filed on May 29, 2020, containing the status of the foregoing.

A similar request is being made to Judge Paul A. Crotty in another related ADA matter captioned: *Velasquez v. 40059 Owners Corp.*, Case No.: 18-cv-06988.

We thank the court for its attention in this matter.

**Boyd Richards Parker & Colonnelli, P.L.  
Attorneys for 40059 Owners**

SO ORDERED:

By: /s/ Gary Ehrlich

Dated: March 31, 2020  
New York, New York

  
WILLIAM H. PAULEY III  
U.S.D.J.